

CONSUMER  
DATA  
STANDARDS

# Data Standards Body

Consumer Experience Workstream

*Consultation Draft 6 | CDR Logos | 26.03.20*

# Context

The Australian Competition and Consumer Commission (ACCC) is looking to prioritise the use of the CDR logo for 2020 CDR implementations.

Possible considerations include:

- The use of the CDR logo by accredited persons/accredited data recipients (ADRs) in connection with requests for consent to collect and use CDR data.
- The use of the CDR logo by data holders (DHs) in connection with requests to authorise the disclosure of CDR data.
- Licence terms to accompany the use of the CDR logo.
- The ACCC is considering how the standards might require the use of the CDR logo.

[Version 1.2.0 of the Consumer Experience \(CX\) Guidelines](#) contain non-mandatory guidelines on CDR logo use as follows:

1. ADR guidelines on p.37-39 stating ADRs '*SHOULD use CDR branding provided by the ACCC to facilitate consistency, familiarity, and trust in the CDR ecosystem.*'
2. A DH guideline on p.78 stating DHs '*SHOULD show the ACCC provided CDR branding...*' in the context of the authorisation flow.

This decision proposal proposes the changing of these guidelines into standards, and outlines other options and locations for the CDR logo.

Community feedback is sought on these options, and any other options that are raised for consideration, prior to a recommendation for a final proposal being made to the Data Standards Chair.

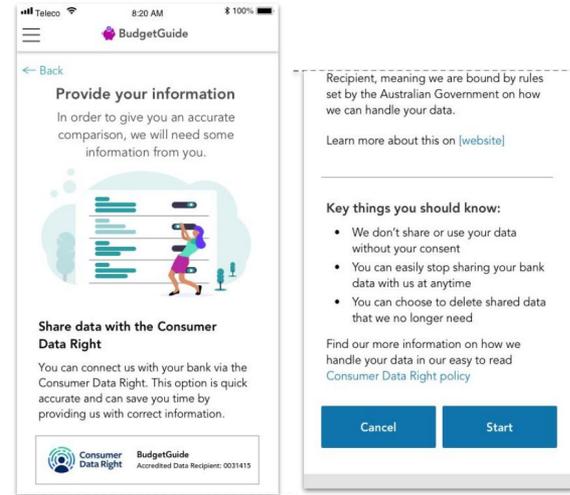
# Decision to be made

This consultation is being conducted to **obtain feedback on:**

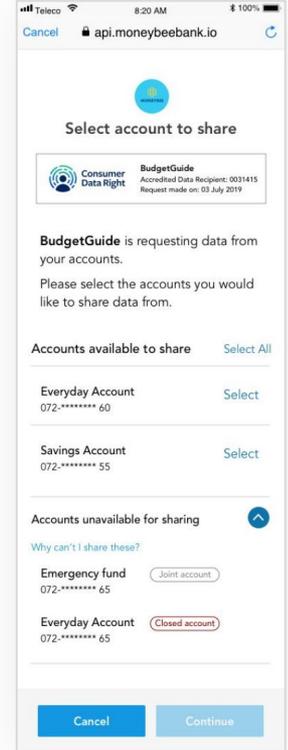
1. The **changing of existing items on CDR Logos from CX Guidelines (a SHOULD) to CX Standards (a MUST);**
2. **Where else in the Consent Model and CDR ecosystem the CDR logo could be applied;**
3. **Whether such inclusions should be classed as guidelines or standards; and**
4. **The time required for successful implementation of the options in this paper, and any other options raised for consideration.**

**Feedback for this paper is planned to close on 9th April 2020.**

***NB Feedback should consider ADR vs DH obligations and respective July 2020, November 2020, and subsequent 2021 implementations.***



Example CDR Logo location for ADRs



Example CDR Logo location for DHs

# Clarifications and Assumptions

The [consumer research to date](#) has shown that the use of a ‘trust mark’ fosters trust and confidence in the CDR process, especially when linked to the accreditation of ADRs.

The use of the CDR Logo as a ‘trust mark’ in consumer education campaigns will help increase CDR awareness, and the inclusion of the CDR logo throughout the Consent Model will facilitate consistency, familiarity, and trust in the CDR ecosystem.

**Accredited persons** are currently defined as accredited organisations *before* they have received CDR data. **Accredited data recipients (ADRs)** are accredited organisations *after* they have received CDR data.

For simplicity, this paper will use **accredited data recipients** (ADRs) to refer to both **ADRs** and **accredited persons**.

Where possible, **ADR** options presented in this paper are being proposed **for a July 2020 implementation**.

Where possible, **DH** options presented in this paper are being proposed **for a November 2020 implementation**.

**NB** The CDR Rules will need to be amended to authorise the creation of standards relating to the options in this paper.

## PROPOSAL

# CDR Logo use by ADRs

*Proposed commencement date: July 2020 pending consultation*

ADRs **MUST** use the CDR Logo provided by the ACCC to facilitate consistency, familiarity, and trust in the CDR ecosystem.

ADRs **MUST** use the CDR Logo in the course of requesting consumer consent to collect and use CDR data. This **MAY** include the steps immediately preceding a request to collect and use CDR data, such as the 'pre-consent' stage.

ADRs **MUST** use the CDR Logo on consumer dashboards and this **MUST** be in association with CDR consents.

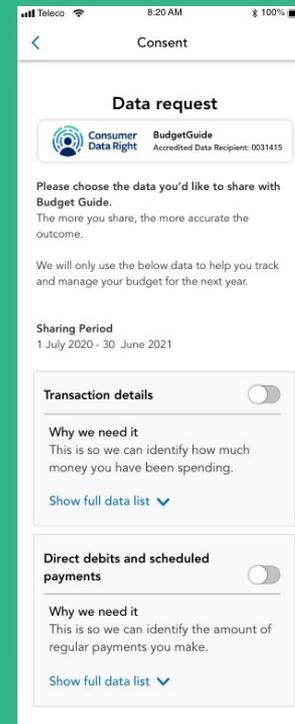
ADRs **MUST** use the CDR Logo on CDR Receipts and Consent Model related notifications, such as 90 day notifications and re-consent/authorisation requests (if provided for in the future).

ADRs **MUST** use the CDR Logo in their CDR policy. ADRs **SHOULD** use the CDR Logo, where appropriate, for other CDR-related communications and interactions.

The exact locations of CDR Logos in the Consent Model are at the discretion of the ADR but any use **MUST** be in direct relation to CDR and **MUST NOT** be used in relation to non-CDR data sharing.



Example of CDR Logo use in the 'pre-consent' stage



Example of CDR Logo use in the consent step

## PROPOSAL

# CDR Logo use by DHs

*Proposed commencement date: November 2020 pending consultation*

DHs **MUST** use the CDR Logo provided by the ACCC to facilitate consistency, familiarity, and trust in the CDR ecosystem.

DHs **MUST** use the CDR Logo in the course of authenticating the consumer associated with the data request. Where appropriate and practical, DHs **MUST** use the CDR Logo in conjunction with any One Time Password delivery communications.

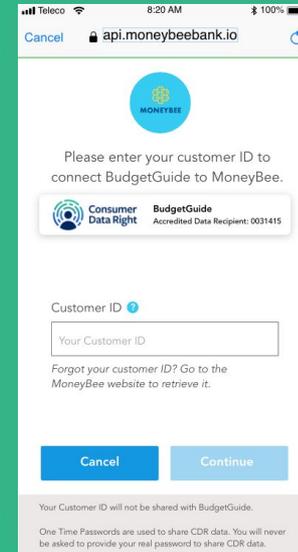
DHs **MUST** use the CDR Logo throughout the authorisation flow in relation to the ADR requesting data. Use of the CDR Logo elsewhere in the authorisation flow is at the discretion of the DH.

DHs **MUST** use the CDR Logo on consumer dashboards and joint account management services and this **MUST** be in association with CDR authorisations.

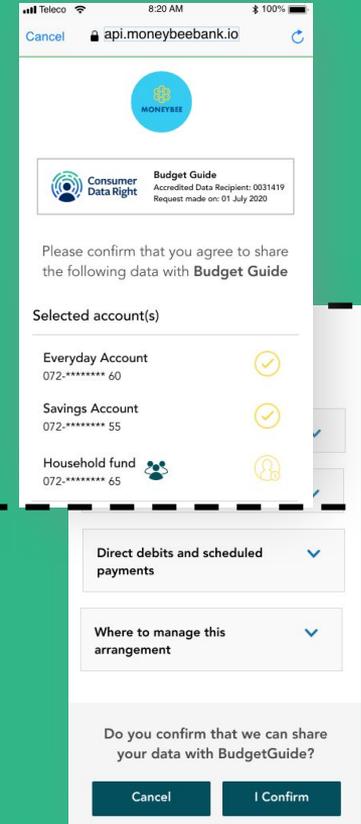
DHs **MUST** use the CDR Logo on Consent Model related notifications, such those relating to joint account election for both joint account holders.

DHs **MUST** use the CDR Logo in their CDR policy. DHs **SHOULD** use the CDR Logo, where appropriate, for other CDR-related communications and notifications.

The exact locations of CDR Logos in the Consent Model are at the discretion of the DH but any use **MUST** be in direct relation to CDR and **MUST NOT** be used in relation to non-CDR data sharing.



Example of CDR Logo use in authentication flow



Example of CDR Logo use in the consent step

# Feedback

**Feedback for this paper is planned to close on 9th April 2020.**

The community is invited to provide feedback on this paper on the relevant [CX consultation page](#) and on [GitHub](#).

Feedback will also be accepted via email to [cdr-data61-cx@csiro.au](mailto:cdr-data61-cx@csiro.au).

In accordance with the regular practice of the Data Standards Body, email submissions will be posted on GitHub and the CX consultation page to ensure transparency of the consultation process.

Where participants believe they have sensitive information to convey we will consider those discussions and give guidance on our preferred disclosure approach prior to meeting to discuss such issues. To discuss, please email us at [cdr-data61-cx@csiro.au](mailto:cdr-data61-cx@csiro.au).

You can keep up to date on the CX Workstream's developments by signing up to our [mailing lists](#), subscribing to our [blog](#), and tracking issues on [Github](#).

The Consumer Data Standards website contains the latest [CX Standards and CX Guidelines](#), which are also located on the [technical standards page](#).

CX Reports containing insights and recommendations from ongoing consumer research can be found in our [Knowledge Centre](#).

You can contact the CX Workstream via email on [cdr-data61-cx@csiro.au](mailto:cdr-data61-cx@csiro.au)